

Privacy Notice: TKS  
Applicability: TKS Students

This privacy notice ("Notice") applies to current and former The KAUST School (TKS) students at King Abdullah University of Science and Technology ("KAUST", "we", "us", "our"). The purpose of this Notice is to inform parents, legal guardians, and students over 13 about how we process TKS students' Personal Data. This Notice does not form or constitute a contract.

For the purpose of applicable data protection legislation, the entity which is responsible for your Personal Data is King Abdullah University of Science and Technology, Thuwal 23955-6900, Kingdom of Saudi Arabia.

This Notice replaces and supersedes any previous notices addressing the same or similar issues, whether formal or informal. KAUST reserves the right to alter, amend, or replace this Notice in whole or in part. The latest version of this Notice can be found here. You should always check that you are referring to the latest version of this Notice if you have previously downloaded hard copies of this Notice.

## **1. What Personal Data do we process about TKS students?**

Below are some examples of categories of Personal Data we may hold about students:

- Demographic details, such as name, date of birth, gender, nationality, languages spoken
- Contact details such as home address, mobile phone number and email address
- Personal identifiers, such as Student Number, account usernames, and KAUST ID
- Government IDs, i.e., Passport, Iqama, National ID, Birth Certificate
- Information about family members (including parents' names, jobs, nationalities, government IDs, mother tongues, contact details, etc.)
- Special educational support
- Previous schools attended and associated transcripts
- Emergency contact information
- Registration information, enrollment dates, attendance history, documentation related to absences and extended absences, and IB certificates issued
- Billing and payment of tuition and fees, including IT and materials charges
- Grades, transcripts, third-party assessment results (i.e., MAP test), and report cards
- Class registration, assigned teachers and classrooms, schedule
- Homework collected, results of assessments and assignments, and feedback received
- Behavioral information, notes by TKS personnel
- Disciplinary and complaint/grievance information
- Reports on safeguarding needs
- Information about use of TKS IT systems
- Minimal CCTV footage
- History of library books checked out
- Communications through email, chat, and other media

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- Participation in extra-curricular activities, athletic programs, performing arts programs, school trips and events
- Photographs, audio recordings, and videos
- Participation in tutoring, internships, and external collaborations
- Student progress during the university selection process
- Information about post-secondary plans

## **2. What sensitive Personal Data may be collected?**

We may collect the following sensitive Personal Data:

- Information about health and mental health, including:
  - Health information provided to TKS by a job applicant prior to an offer of employment
  - Health Information forms completed by parents prior to the start of the school year
  - Health records kept by the school nurse, including health office visits, illnesses or injuries that presented/occurred during school hours, vaccination records, and screening results
  - Information related to speech and language therapy and learning differences/needs
  - Mental health records kept by school counselors and school psychologists
  - Health or mental health information related to individualized learning plans, requests for accommodation, or requests for an extended absence
- Information about a student's health; race, tribe, and/or ethnicity; or criminal and security history related to a filed grievance/complaint or a reported disciplinary issue
- That a child has one or more unknown parents, which a student or parent may reveal

Children are considered a vulnerable category under certain data protection laws.

## **3. Where do we get the Personal Data?**

Some information about students is provided by their parents (or other parents). For example, parents provide information about their children when they register/re-enroll their children for school, complete forms on the parent portal, enroll children in co-curricular activities, and communicate with TKS personnel.

Teachers, counselors, school nurses, school administrators, coaches, and other TKS personnel may provide information about students. This may be feedback or comments regarding school work and academic performance, behavior, medical events, schedules, upcoming performances, and other school-related matters.

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TKS may get information directly from students themselves, i.e., through communications (email, in-person, virtual, and via phone or text), and by school work or documentation they submit.

In some cases, TKS will receive information about students from third parties. Below are some examples of external sources and the data we may receive:

- **Medical service provider at KAUST Health:** Health screening results
- **Photographers / Videographers hired by TKS:** School photos and videos
- **Professionals working with your child:** With parental consent, assessments, counseling notes, health and/or mental health records may be provided to support students with specific needs.
- **Software providers:** student progress or completion of homework assignments involving use of software
- **Test providers:** Assessment results (such as MAP tests)

#### 4. Do I need to provide all of the information requested?

Student data is essential for the school’s operational use. The majority of information parents are requested to provide is mandatory; some may be requested on a voluntary basis. We will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this.

#### 5. Why do we collect and process the Personal Data?

We process our students’ Personal Data to help us effectively provide schooling and to provide a range of educational, preparatory, and co-curricular opportunities to complement the academic curriculum. The table below lists some reasons why we may process Personal Data and the associated legal basis.

| PURPOSE   | LEGAL BASIS   |
|---|---|
| Support student learning and academic attainment  | Consent   |
| Evaluate and report on academic progress  | Consent   |
| Keep students safe (i.e., collecting information about food allergies) and provide health assistance (i.e., when the student is ill, injured, or has a medical condition) | Consent<br>Serve the student’s definite interest when difficult to contact<br>Serve the student’s vital interests<br>Protect public health or safety<br>Comply with applicable laws |
| Screen for vision, hearing, and other medical issues  | Consent   |

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| Manage emergency situations (i.e., by collecting emergency contact information)  | Consent<br>Serve your definite interest when difficult to contact you<br>Serve your vital interests<br>Protect public health or safety<br>Comply with applicable laws |
| Keep access-controlled facilities and equipment safe via limited use of CCTV   | Consent<br>Legitimate interest in supporting the security of KAUST's facilities and equipment   |
| Provide student support services, including talent and enrichment, learning support, counseling and psychology, speech and language therapy, English language support, and individualized learning | Consent   |
| Provide extra-curricular opportunities   | Consent   |
| Determine eligibility for admission to the school  | Consent   |
| Test the functionality of systems and applications; manage information; analyze data to evaluate and improve services  | Legitimate interest to ensure student operations and services run efficiently, and to inform business decisions   |

Student Personal Data will not be processed later in a manner inconsistent with these purposes, except as provided or required by law.

**6. Is there automated decision-making or profiling involved?**

No, KAUST does not rely on any automated decision-making or conduct any profiling in this process.

**7. Who do we share the Personal Data with?**

Within TKS and KAUST, we share the minimum relevant information with the specific individuals deciding upon a request or issue or needed to provide you with a relevant service.

Below is a list of external entities and individuals with whom we may share your information:

| Entities and individuals                                   | Information we may share (when applicable) and why  |
|--|---|
| Consultants providing workshops or training                | Basic information (i.e., name and grade) about participants. Students may share personal information with leaders through interactions, tasks, and/or activities. |
| Contractor workforce employees and independent contractors | Some individuals processing student Personal Data may be contractor workforce employees and/or independent contractors who work at TKS.                           |

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| CPOMS  | Relevant TKS personnel will report signs of abuse in the CPOM system, a software solution for monitoring safeguarding and wellbeing issues.   |
| University and career-planning platforms       | TKS may provide university and career-planning platforms and submit basic information about students to register them on the platform.  |
| Emergency contact and/or emergency responder   | TKS may disclose relevant information to an emergency contact and emergency responders in emergency cases, i.e., suspected/confirmed death, urgent hospital admission for a serious health reason, loss of consciousness and unresponsiveness, serious physical injury or mental health crisis, a student reported missing, or for other serious welfare concerns.  |
| International Baccalaureate                    | In grades 10 and 12, select student work is submitted to the International Baccalaureate for grading. Submissions are coded, with personal identifiers removed, to prevent identification of the student.   |
| Learning platforms                             | TKS may share student names, grades, and class information to register a student on one or more learning platforms.<br><br>Learning platforms may capture, for example, assignments; feedback from other students, parents, and teachers; progress reports and/or grades; and communications (i.e., chat history).  |
| Medical professionals, counselors, coaches     | With parental consent, health and mental health information relevant to a student’s schooling will be exchanged with medical professionals (including psychiatrists and psychologists), counselors, and coaches working with that student.  |
| Medical Service Provider at KAUST              | With your written consent, TKS will share relevant information with KAUST Health so it can provide you with support.<br><br>TKS will share information with KAUST Health when an individual is a health or safety risk to themselves or others, including for child protection cases.   |
| Ministry of Education / Noor System            | Student information may be shared with the Ministry of Education’s Noor Registration System.  |
| Other schools, universities, and organizations | With consent, TKS may share information required to verify a student’s current and/or historical enrollment and attendance at TKS and transcripts. Upon request, TKS personnel may provide letters of recommendation, which will include relevant student information and GPA.<br><br>TKS may share basic student information with other schools or organizations to organize school field trips and participation in off-campus competitions (i.e., sports or academic). |

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| Photographers                               | Student names, grades, classes, and parents' emails may be shared with external photographers for school photos. Sport and sibling photos may also reveal sport participation and sibling relationship. |
| Software providers and software consultants | Student Personal Data is processed using software. Project-based consultants may support KAUST with software development, and that may include access to some student Personal Data.                    |
| Survey providers                            | To collect feedback related to TKS services, we may share basic student details (names, grade, KAUST email address) with a survey provider to send out surveys and collect responses.                   |
| Social media and websites                   | Photos and videos of TKS students may be shared by TKS and KAUST for marketing, media and communication materials. Please see the following <a href="#">privacy notice</a> for more information.        |
| University Travel Office                    | Personal details, passport information, and travel plans may be shared to facilitate school-sponsored travel.   |
| Zakat, Tax, and Customs Authority (ZATCA)   | Invoices or payments subject to audit or government regulations will be stored in ZATCA servers for VAT purposes.   |

## 8. How long do we keep students' Personal Data?

Student Personal Data are retained in line with TKS' approved records schedule. After the retention period, the Personal Data will be securely and permanently destroyed – unless retention is further required for legal or judicial reasons.

### Applications for Admission to TKS

- Incomplete applications: 1 year. Where applicants have undergone testing at TKS' request, such applications are retained for 3 years.
- Withdrawn applications: 3 years.
- Rejected applications, except for the rejection letter: 5 years. Rejection letters are retained until the student's graduation or expected year of graduation.

### Student Records

- Registration and re-enrollment: 10 years after graduation or expected graduation
- High school course enrollment: 10 years after graduation or expected graduation
- Responsible Use of Technology Agreements: 10 years after graduation or expected graduation
- Consent for photos and videos for media, marketing, and communications materials: 10 years after graduation or expected graduation
- Academic Honesty Contracts: Until the end of the academic year
- Student contact information: 10 years after graduation or expected graduation
- Attendance: 10 years after graduation or expected graduation
- Digital learning: Not to exceed 5 years after graduation or expected graduation

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- Physical learning: For Kindergarten and Elementary students, physical originals of student assignments, reflections, self-assessments, and portfolios are returned to parents/guardians at the conclusion of the school year.
- TKS email: Graduate student accounts are deactivated by the end of June and deleted in December; accounts of student departing prior to graduation are immediately deactivated.
- Google Chat: No longer than 1 year
- Student support and special education records: 10 years after graduation or expected graduation
- Device assignment and check-out: No longer than 5 years after the patron separates from TKS
- Device patron accounts: 5 years after graduation
- Library patron accounts: No longer than 4 years after account inactivity
- Bus transportation requests and assignments: Conclusion of the school year
- School nurse records and school psychology records: 10 years after student leaves TKS
- Counseling files: For as long as the student is active at TKS
- Pulse survey responses: Student's graduation or expected graduation
- Safeguarding reports in CPOMS: Until the student has left TKS; backup data may be preserved.
- Tootoot communications: Retained in line with [Tootoot's retention policy](#)
- Behavior-related log entries: 10 years after graduation or expected graduation. Related documentation is retained for 4 years after the date of creation; however, documentation related to suspensions, expulsions, and academic misconduct is retained for 40 years after graduation or expected graduation.
- Behavior action plans: For as long as the plan is in effect
- Paper records of signed attendance contracts: Until the required credit has been achieved
- Individual activity signup and schedule: Completion of school year
- Final roster of student participation in athletics and activities: 4 years
- Annual permission forms for activities and athletics: 10 years after graduation or expected graduation
- Expression of Interest forms for field trips or travel, lists and itineraries, group chats, student conduct agreements: Completion of school year
- Customized school day field trip or travel permission forms and liability waivers: 3 years after completion of the field trip or travel
- Student-led group proposals: End of academic year
- KEY tutoring account: Account deletion after 1 year of inactivity
- KEY external collaboration program participation: 1 year after program end date.
- WISER Internship Data: 10 years after graduation or expected graduation; unsuccessful applications are retained until the completion of the program.
- Unpublished photos and videos: No longer than 3 years after school year completion
- Individual accounts in University and career planning platforms: 2 years after graduation
- Individual survey responses (excluding Pulse survey responses): No longer than 1 year
- Individualized reports generated from survey responses: No longer than 3 years
- Report cards: 10 years after graduation or expected graduation

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- Standardized test results: 40 years after graduation or expected graduation
- Transcripts: 40 years after graduation or expected graduation
- Alumni network registration: Retained until any withdrawal of consent
- Student record request and outcome: 2 years
- Student exit clearance form: 1 year
- Government IDs collected for Noor system entry: A maximum of 3 years once the student has been confirmed in the Noor system

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